



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

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April 13, 2016

Glenn W. Mueller, President  
Mueller Corp.  
530 Spring St.  
East Bridgewater, MA 02333

RE: **Revised ADMINISTRATIVE AMENDMENT OF LPA No. SE-11-031:**

Application No.: SE-16-007

Transmittal No.: X270160

Facility ID No: 130652

AT: Mueller Corp.  
530 Spring St.  
East Bridgewater

Dear Mr. Mueller:

The Department of Environmental Protection (MassDEP), Bureau of Air and Waste has determined that the referenced Administrative Amendment Application (“AA”), is administratively complete and in conformance with current air pollution control practices. The MassDEP is reissuing approval No. SE-16-007, originally issued on April 8, 2016, modifying LPA No. SE-11-031 which authorized an increase in capacity at an existing facility at Mueller Corp. (herein referred to as “Permittee” or “Mueller”), 530 Spring St., East Bridgewater, Massachusetts. This revision corrects errors relating to citations of 310 CMR 7.03(16) as contained in the Special Conditions section of the original approval letter.

This LPA Approval is in accordance with 310 CMR 7.02(1), (3), and (4) of the Air Pollution Control Regulations (“Regulations”), 310 CMR 7.00, as adopted pursuant to M.G.L. c.111, sections 142A-142K.

Included as part of the LPA Approval are the following:

- *Stamped approved LPA-Process BWP AQ 01 Application Form received on November 7, 2011,*
- *Supplemental information received on January 26, 2012 and April 1, 2016*
- *General Conditions for Non-Fuel Emissions LPAs,*
- *Special Conditions, and*
- *Appeal Rights*

Please review the entire LPA Approval carefully as it stipulates the conditions that the Facility owner/operator must adhere to for the Facility to be constructed/reconstructed/altered and operated in compliance with the Regulations.

MassDEP has determined that the filing of an Environmental Notification Form ("ENF") with the Secretary of Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act and Regulation 301 CMR 11.00, section 11.04, provide certain "Fail-Safe Provisions" that allow the Secretary to require the filing of an ENF and/or Environmental Impact Report at a later time.

Should you have any questions concerning this FINAL APPROVAL, please contact Peter Russell at (508) 946-2821.

Sincerely,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

Thomas Cushing  
Permit Chief  
Bureau of Air and Waste

Enclosures

ecc: East Bridgewater Board of Health  
East Bridgewater Fire Dept.  
Mueller Corp                      Attn: G. Mueller  
DEP/BWP/BC-Boston          Attn: Y. Tian  
DEP/SERO                         Attn: E. Bystrom

**GENERAL CONDITIONS FOR NON-FUEL EMISSION LPAS**

The Permittee is subject to, and shall comply with, the following general conditions:

1. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
2. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
3. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
4. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
5. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
6. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
7. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
8. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
9. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
10. The Permittee shall conduct emission testing, if requested by MassDEP, in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13. If required, a pretest

protocol report shall be submitted to MassDEP at least 30 days prior to emission testing and the final test results report shall be submitted within 45 days after emission testing.

11. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

### **SPECIAL CONDITIONS FOR NON-FUEL EMISSION LPAS**

This LPA Approval modifies the terms and conditions of Mueller's previous Plan Approval, allowing a 9.5 ton per year increase in emissions for both Volatile Organic Compounds and noncriteria pollutants. Additionally, this LPA Approval establishes Best Available Control Technology (BACT) for visible emissions from the paint spray booths and authorizes the installation of an automated UV coating line at the facility. As approved in NMCPA No. 4P05030, the facility shall include 4 manual spray booths and 5 automated spray booths. The approved UV coating line is included as one of the five automated coating lines.

1. The Permittee shall maintain and operate each paint spray booth in a manner consistent with MassDEP Regulation 310 CMR 7.03(16) "Paint Spray Booths." This includes, but is not limited to:
  - a. Utilizing a dry fiber mat filter that achieves a total particulate control efficiency of at least 97% by weight.
  - b. Utilizing a stack that discharges vertically upwards with a minimum exit height of 35 feet above ground level or 10 feet above roof level.
2. Notwithstanding Provision 1, above, the Permittee is given relief from the opacity limitation contained in 310 CMR 7.03(16)(j) and shall limit opacity (visible emissions) as follows:
  - a. Paint spray booth stacks: 5%
  - b. All other facility operations: 0%
3. Notwithstanding Provision 1, above, the Permittee is not subject to the emission limitations contained in 310 CMR 7.03(16)(a). The Permittee shall limit emissions from the facility as follows:

Pollutant	Emissions <sup>1</sup>	
	Tons per month	Tons per year <sup>2</sup>
VOC	11.2	44.5
PM /PM <sub>10</sub> /PM <sub>2.5</sub> <sup>3</sup>	0.04	0.27
Maximum single HAP	1.3	9.9
Total HAPs	3.3	24.9
Non-criteria pollutants	2.4	9.5

Notes:

1. All emission limitations include products of combustion from fuel burning.
  2. Tons per year based on a consecutive 12-month period.
  3. Particulate emissions are based on 50% overspray and 97% capture of overspray material.
- VOC = Volatile Organic compounds  
PM = Particulate Matter  
PM<sub>10</sub> = Particulate less than 10 microns in diameter.  
PM<sub>2.5</sub> = Particulate less than 2.5 microns in diameter.  
HAPs = Hazardous Air Pollutants

4. In addition to the emission limits contained in provision 3, above, the Permittee shall limit VOC emissions from Specialty Coatings as follows:
  - a. 1 ton per month
  - b. 1 ton per consecutive 12-month period.
5. The Permittee shall maintain records from production activities on a **daily** basis to document compliance with the emission limitations in Provision 3. At the beginning of each month, within fifteen (15) days thereof, the Facility shall calculate the VOC, maximum single HAP, total HAP, and noncriteria pollutant emissions from the prior month and the previous consecutive 12-month period. The Permittee shall also calculate the quantity of coatings with a VOC, HAP, and noncriteria content.
6. Mueller shall limit the maximum VOC and HAP content of all coatings, on an “as applied” basis, as follows:
  - a. Top coat: 72.0 pounds of VOC per gallon of solids.
  - b. Base coat: 43.5 pounds of VOC per gallon of solids.
  - c. Specialty coatings: 120 pounds of VOC per gallon of solids.
  - d. All coatings: 4.57 pounds total HAPs per gallon of coating.
  - e. All coatings 4.2 pounds of non-criteria per gallon of coating.
7. This Plan Approval supersedes the following approval letters:
  - a. Administrative Amendment No. SE-16-007, dated April 8, 2016
  - b. Final Approval No. SE-11-031 (transmittal No. X240450), dated March 20, 2012
  - c. Conditional Approval No. 4P05030 (transmittal No. W065342), dated October 26, 2005
  - d. Conditional Approval 4P94115 (transmittal No. 68049), dated September 4, 1996.

The above listed MassDEP approvals shall be deemed null and void.

8. Mueller may reconcile the VOCs, HAPs, and non-criteria pollutants contained in any hazardous waste shipped during the month when determining monthly emissions. The Permittee shall maintain beginning and end of year inventory records, hazardous waste disposal records, and purchase records for VOC, HAPs, and noncriteria containing materials, etc, such that MassDEP may check these for consistency with plant logs. Such records shall verify the VOCs, HAPs, noncriteria pollutants and the quantity present in the waste being shipped, if reconciling monthly emissions.
9. Mueller shall store and dispose of VOCs, HAPs, and noncriteria pollutants in a manner that will minimize evaporation to the atmosphere. Proper storage shall be in a container with a tight fitting cover. Proper disposal shall be in a manner consistent with all applicable regulations.

10. A detailed record keeping system shall be maintained to verify compliance with all conditions of this approval.
11. The Permittee shall be operated in strict accordance with the application approved herein. Should there be any differences between the aforementioned application and this approval letter, this approval letter shall govern.
12. The Permittee comply with all conditions contained in this Final Approval. Should there be any differences between conditions contained in the "General Conditions" and the conditions contained in the "Special Conditions" of this Final Approval, the "Special Conditions" shall govern.

**APPEAL OF APPROVAL**

This Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts that are the grounds for the request, and the relief sought. Additionally, the request must state why the Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts  
Department of Environmental Protection  
P.O. Box 4062  
Boston, MA 02211

The request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below.

The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.